

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

MAR 18 2025

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

DOCKET NO. 3:25-cr-51-KDB

v.

BILL OF INDICTMENT

Violations:

21 U.S.C. 841(a)(1)

18 U.S.C. 924(c)

18 U.S.C. 922(g)(1)

PARIS ALONZO LEWIS-BYNUM

THE GRAND JURY CHARGES:

COUNT ONE

(Possession with Intent to Distribute Crack Cocaine)

On or about the March 28, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

PARIS ALONZO LEWIS-BYNUM,

knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine base, also known as crack cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

On or about March 28, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

PARIS ALONZO LEWIS-BYNUM,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, Possession with Intent to Distribute a Controlled Substance, a violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count One of this Bill of Indictment and incorporated by reference herein, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT THREE

(Possession of a Firearm by a Felon)

On or about March 28, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

PARIS ALONZO LEWIS-BYNUM,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Taurus, model G2C, .40 caliber semiautomatic pistol, in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT FOUR

(Possession of a Firearm by a Felon)

On or about December 16 through December 18, 2024, in Mecklenburg County, within the Western District of North Carolina, the defendant,

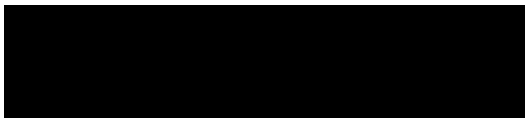
PARIS ALONZO LEWIS-BYNUM,

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, that is, a Sig Sauer, model SIG M400, 5.56 caliber, semiautomatic rifle, in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of the provisions of 18 U.S.C. § 924(d) and the statutes incorporated or referred to therein. The firearms and ammunition listed below are subject to forfeiture in accordance with § 924(d) because they were involved in, used, or intended to be used in the violation alleged in this bill of indictment. The Grand Jury finds probable cause to believe that the Taurus, model G2C, .40 caliber semiautomatic pistol and the a Sig Sauer, model SIG M400, 5.56 caliber, semiautomatic rifle are subject to forfeiture on one or more of the grounds stated above.

A TRUE BILL



FOREPERSON

RUSS FERGUSON
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'TS', is written over a horizontal line.

TIM SIELAFF
ASSISTANT UNITED STATES ATTORNEY